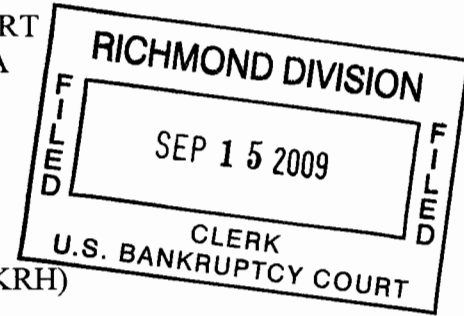


IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION



-----: Chapter 11
In re: :
: :
CIRCUIT CITY STORES, INC., : Case No. 08-035653 (KRH)
et al., :
: :
Debtors. : Jointly Administered
-----:

**RESPONSE TO DEBTORS' THIRTY-FIRST OMNIBUS OBJECTION
TO CLAIMS FILED BY RICHARD AND DEBORAH JAYNES**

Pursuant to the Order Establishing Omnibus Objection Procedures, Claimants file their response to the Omnibus Objection as follows:

1. The caption of the case is set out in this pleading.
2. The Claimants are Richard Jaynes and Deborah Jaynes and they have filed a Proof of Claim against the Debtors.


3. The Claimants contended that the debtors disclosed their personal financial information. The Claimants purchased a new computer from a Circuit City store in Ocala, Florida, and as part of the purchase agreement Debtors agreed to transfer all data from their old computer onto the new computer purchased by the Claimants. Subsequent to picking up their new computer, the Claimants received calls from other patrons of Debtors store indicating that the Jaynes personal information had been loaded on the computers that they purchased from Circuit City. Mr. and Mrs. Jaynes claims \$50,000.00 in damages for dissemination of their personal financial information to compensate them for this and for the necessary costs to protect their information for a period of time.

4. The Claimants claim is an unliquidated amount. The Claimants have a valid claim against the Debtors Circuit City Stores. Objection 31 alleges that Circuit City has no legal liability to the Jaynes. The facts show that Circuit City did in fact disclose the Jaynes personal information to third parties. Therefore the Omnibus Objection should be disallowed. The Claimants will support their claim by giving testimony from individuals who received the Claimants personal information and also Claimants' testimony of the steps they had to take to safeguard their personal financial information after Debtors Circuit City had disclosed that to third parties.

5. The Claimants have no specific documentation to prove the damages alleged in the Proof of Claim but Claimants have attached a copy of the contract they had with Circuit City.

6. Claimants address: Richard and Deborah Jaynes c/o Clive N. Morgan, Attorney, 6712 Atlantic Boulevard, Jacksonville, Florida 32211. Telephone No.: 904-727-9300; Facsimile No. 904-724-8428; Email Address: clive@clivemorgan.net.

CLIVE N. MORGAN, P.A.



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(904) 724-8428 (facsimile)
Attorney for Claimants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished via Federal Express Delivery, Next Day Delivery, this 14th day of September, 2009, to:

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Clive N. Morgan

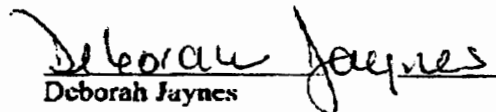
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:	:	Chapter 11
CIRCUIT CITY STORES, INC.,	:	Case No. 08-035653 (KRII)
et al.,	:	
Debtors.	:	Jointly Administered

DECLARATION FOR DEBORAH JAYNES

The undersigned Deborah Jaynes being duly sworn, avers and says:

1. She is the Claimant in the above captioned bankruptcy.
 2. She has reviewed her Response to the Debtors Thirty-First Omnibus Objection.
 3. She has personal knowledge of all the facts contained in their response.
 4. All the facts are true and correct to the best of her knowledge.
- I, Deborah Jaynes, certify under penalty of perjury that the above and foregoing is true and correct.


Deborah Jaynes